

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
CANDY CLUB, LLC, <i>et al.</i> , <sup>1</sup>	)	Case No. 23-60048 (CML)
Debtors.	)	(Jointly Administered)
	)	

**SUMMARY COVER SHEET TO THE FIRST INTERIM FEE APPLICATION OF  
JACKSON WALKER LLP AS COUNSEL TO THE DEBTORS FOR THE FEE PERIOD  
FROM JULY 27, 2023 THROUGH OCTOBER 31, 2023**

<b>Name of Applicant:</b>	Jackson Walker LLP	
Applicant's Role in Case:	Counsel to the Debtors	
Docket No. of Employment Order(s):	Docket No. 179	
Interim Application (X) No. <u>1</u> Final Application ( )	First Interim	
	<b>Beginning Date</b>	<b>End Date</b>
Time period covered by this Application for which interim compensation has not previously been awarded:	July 27, 2023	October 31, 2023
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? <b>Yes.</b>		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? <b>Yes.</b>		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? <b>Yes.</b>		
Do expense reimbursements represent actual and necessary expenses incurred? <b>Yes.</b>		
<b>Compensation Breakdown for Time Period Covered by this Application</b>		
<b>Total professional fees requested in this Application:</b>	\$363,329.50	
<b>Total professional hours covered by this Application:</b>	543	

<sup>1</sup> The Debtors (with the last four digits of the Debtor's federal tax identification number) in these chapter 11 cases are: Candy Club, LLC (8533), Candy Club Holding, Inc. (5377), Candy Club Acquisition, LLC (9010), and Candy Club Investment, LLC (None). The Debtors' service address is 10736 Jefferson Blvd. #325, Culver City, CA 90230.

<b>Average hourly rate for professionals:</b>	\$669.12
<b>Total paraprofessional fees requested in this Application:</b>	\$7,999.00
<b>Total paraprofessional hours covered by this Application:</b>	32.8
<b>Average hourly rate for paraprofessionals:</b>	\$243.87
<b>Total fees requested in this Application:</b>	\$371,360.50
<b>Total expense reimbursements requested in this Application:</b>	\$4,828.85
<b>Total fees and expenses requested in this Application:</b>	\$376,189.35
<b>Total fees and expenses awarded in all prior Applications:</b>	N/A
<b>Plan Status:</b> The Debtors have now negotiated a fully consensual plan of reorganization. That draft plan and disclosure statement has now been circulated to all parties for comment. The Debtors hope to have the plan filed in the next week.	
<b>Primary Benefits:</b> Negotiated consensual final DIP order with key stakeholders, settled with various constituents to pave a path towards consensual confirmation, filed schedules and statements, and enabled the company to meet its liquidity needs and to continue as a going concern.	

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

---

In re:

CANDY CLUB, LLC, *et al.*,<sup>1</sup>

Debtors.

---

)  
) Chapter 11  
)  
) Case No. 23-60048 (CML)  
)  
) (Jointly Administered)  
)

**FIRST INTERIM FEE APPLICATION OF  
JACKSON WALKER LLP COUNSEL TO THE DEBTORS, FOR ALLOWANCE AND  
PAYMENT OF FEES AND EXPENSES FOR THE PERIOD FROM JULY 27, 2023  
THROUGH OCTOBER 31, 2023**

**If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this Application was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this Application was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.**

Jackson Walker LLP (“JW”), counsel to the debtors and debtors in possession (collectively, the “Debtors”), hereby submits its *First Interim Fee Application of Jackson Walker LLP Counsel to the Debtors for Allowance and Payment of Fees and Expenses for the Period From July 27, 2023 Through October 31, 2023* (the “Application”) for interim allowance of (a) compensation for professional services provided by JW in the amount of \$371,360.50 for the period from July 27, 2023 through October 31, 2023 (the “Application Period”), and (b) reimbursement of actual and necessary expenses in the amount of \$4,828.85 that JW incurred during the Application Period.

---

<sup>1</sup> The Debtors (with the last four digits of the Debtor’s federal tax identification number) in these chapter 11 cases are: Candy Club, LLC (8533), Candy Club Holding, Inc. (5377), Candy Club Acquisition, LLC (9010), and Candy Club Investment, LLC (None). The Debtors’ service address is 10736 Jefferson Blvd. #325, Culver City, CA 90230.

1. In support of this Application, JW submits its detailed time entries, attached hereto as **Exhibit A**, which provide a detailed record of fees as counsel for the Application Period.

2. Although every effort has been made to include all fees and expenses incurred during the Application Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Application Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent fee applications will be filed in accordance with title 11 of the United States Code, the Federal Rules of Bankruptcy Procedure, the Bankruptcy Local Rules for the Southern District of Texas, and the Procedures for Complex Cases in the Southern District of Texas.

3. JW requests that this Court enter an order (a) granting interim allowance of compensation for professional services rendered by JW during the Application Period in the amount of \$371,360.50, (b) granting reimbursement of actual and necessary expenses incurred by JW during the Application Period in the amount of \$4,828.85, (c) authorizing the Debtors to pay the fees and expenses to JW as requested for the Application Period, and (d) granting such other and further relief as is just and proper.

Houston, Texas

Dated: December 6, 2023

*/s/ Veronica A. Polnick*

---

**JACKSON WALKER LLP**

Veronica A. Polnick (TX Bar No. 24079148)

Zachary McKay (TX Bar No. 24073600)

Emily Meraia (TX Bar No. 24129307)

Courtney L. Cameron (TX Bar No. 24126882)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: [vpolnick@jw.com](mailto:vpolnick@jw.com)

Email: [zmckay@jw.com](mailto:zmckay@jw.com)

Email: [emeraia@jw.com](mailto:emeraia@jw.com)

Email: [ccameron@jw.com](mailto:ccameron@jw.com)

*Counsel to the Debtors and Debtors in Possession*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 6th day of December 2023, a copy of the foregoing was served via the Court's ECF system upon all parties receiving notice through same.

/s/ Veronica A. Polnick

Veronica A. Polnick

**Exhibit A**

**Detailed Record of Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<b><u>Case Administration:</u></b>				
07/27/23	V. Polnick	13.0	9,750.00	File case and pleadings.
07/27/23	C. Cameron	3.2	1,712.00	Review and prepare first day motions for filing following bankruptcy filing.
07/27/23	E. Flynn Meraia	3.3	1,864.50	Prepare first day motions for filing (1.5); conference and correspond with JW team re same (.8); review same (1.0).
07/28/23	V. Polnick	14.0	10,500.00	Prepare for (12.5) and attend first day hearing (1.5).
07/28/23	C. Cameron	6.4	3,424.00	Attend first day hearing (1.5); meet with team regarding same and go forward strategy (4.9).
07/28/23	E. Flynn Meraia	4.7	2,655.50	Draft, revise w/e list, hearing agenda, and notice of hearing (1.0); assist with hearing preparation (1.6); conference and correspond with JW team re same (1.0); attend first day hearing (partial) (1.1).
07/28/23	J. Gonzalez	2.7	1,444.50	Prepare first day presentation.
07/28/23	D. Trevino	6.0	1,440.00	Communicate with team regarding various Ch V deadlines, calendar placeholders (1.0); Communicate with team regarding various first day pleadings, compiled and prepare for filing (4.5); Calendar related dates and deadlines (.5).
07/28/23	D. Trevino	1.5	360.00	Attend first day hearing.
07/31/23	V. Polnick	5.0	3,750.00	First day hearing follow up (2.2); discussions internally and with client re next steps and process going forward (2.8).
07/31/23	E. Flynn Meraia	5.5	3,107.50	Assist with post-filing workstreams re first day pleadings (4.2); correspond with JW team re same (1.3).
08/01/23	E. Flynn Meraia	0.6	339.00	Telephone conference with JW team re works in progress.
08/04/23	D. Trevino	0.1	24.00	Communicate with J. Pupo regarding various dates and deadlines and collective calendar.
08/04/23	D. Trevino	0.2	48.00	Compile and prepare for filing the notice of commencement (.1) Coordinate service (.1)



<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
08/08/23	V. Polnick	1.0	750.00	Internal discussion re service of notice of commencement.
08/08/23	V. Polnick	1.5	1,125.00	Correspond re various case deadlines and open items.
08/08/23	E. Flynn Meraia	0.3	169.50	Correspond with Company, Stretto re service.
08/09/23	Z. McKay	1.4	980.00	Communications with subchapter 5 trustee. (.3) Communications with the US Trustee. (.5) Work on issues with IP litigation. (.6)
08/10/23	V. Polnick	1.0	750.00	Correspond re various case deadlines and open items.
08/10/23	D. Trevino	0.1	24.00	Compile and prepare for filing the amended notice of top 30 creditors.
08/11/23	V. Polnick	2.0	1,500.00	Coordinate with JW team on all open workstreams (.9); discuss various settlements with interested parties (1.1).
08/11/23	Z. McKay	4.1	2,870.00	Prepare for and attend WIP meeting. (.6) Work on subchapter 5 issues. (3) Communications with subchapter 5 trustee. (.5).
08/11/23	V. Emery	1.5	802.50	Draft responses and objections to Requests for Production.
08/11/23	E. Flynn Meraia	0.5	282.50	Telephone conference with JW team re works in progress.
08/14/23	Z. McKay	0.7	490.00	Communication with subchapter v trustee.
08/16/23	Z. McKay	3.5	2,450.00	Subchapter V trustee objection, matters. (1.5) Work on case strategy. (2)
08/16/23	C. Cameron	0.6	321.00	Call with team to discuss current case status.
08/16/23	E. Flynn Meraia	0.5	282.50	Telephone conference with JW team re case status.
08/17/23	C. Cameron	0.2	107.00	Prepare file of first day motions and orders.
08/18/23	V. Polnick	2.0	1,500.00	Work to reset second day hearing.
08/18/23	D. Trevino	0.7	168.00	Draft notice of reset of second day hearing (.5) Compile and prepare for filing (.1) Coordinate service (.1)

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
08/22/23	C. Cameron	0.5	267.50	Confer with company regarding scheduling and other administrative matters and coordinate schedules regarding the same.
08/23/23	V. Polnick	0.5	375.00	Attend internal WIP meeting.
08/28/23	Z. McKay	1.0	700.00	Prepare for (.5) and attend WIP meeting (.5).
08/28/23	C. Cameron	0.5	267.50	Call with team regarding ongoing work streams.
08/28/23	E. Flynn Meraia	0.5	282.50	Telephone conference with JW team re works in progress
08/28/23	J. Pupo	1.0	230.00	Participate in case progress meeting (.5); calendar deadlines (.5).
09/08/23	C. Cameron	2.5	1,337.50	Call with team to discuss stipulation hearing.
09/11/23	C. Cameron	1.6	856.00	Draft Subchapter V Status Report.
09/12/23	V. Polnick	0.5	375.00	Call with WTI counsel.
09/12/23	D. Trevino	0.2	48.00	Review and prepare for filing the notice of reset hearing on second day (.1) Coordinate service (.1)
09/19/23	V. Polnick	0.6	450.00	Attend team WIP.
09/19/23	C. Cameron	0.6	321.00	Call with team to discuss ongoing workstreams.
09/19/23	E. Flynn Meraia	0.8	452.00	Telephone conference with JW team re works in progress (.5); conference with C. Cameron re same (.1); correspond with JW team re same (.2)
09/25/23	V. Polnick	0.5	375.00	Group update and status call with client.
09/25/23	V. Polnick	0.5	375.00	Participate in team WIP call.
09/27/23	V. Polnick	0.4	300.00	Call with client to discuss case status.
09/27/23	V. Polnick	2.0	1,500.00	Review and revise equity pitch deck.
09/27/23	Z. McKay	0.7	490.00	Prepare for (.3) and participate in client update call (.4).
09/27/23	C. Cameron	0.5	267.50	Call with company and independent director to discuss open matters.
09/28/23	Z. McKay	6.3	4,410.00	Work on response to designation objection.
09/28/23	D. Trevino	0.3	72.00	First draft of response to the objection of the trustee to subchapter V designation.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/29/23	Z. McKay	5.5	3,850.00	Work on response to designation objection.
09/29/23	C. Cameron	1.8	963.00	Review and revise response to UST objection to small business designation.
09/30/23	Z. McKay	0.4	280.00	Multiple communications re designation matter.
10/02/23	V. Polnick	0.3	244.50	Provide case status update to client.
10/03/23	Z. McKay	1.0	725.00	Prepare for and attend client call.
10/03/23	M. Ghyas	0.2	103.00	Conference with V. Polnick re case management (.1); review correspondence regarding edits to Disclosure Schedules (.1).
10/12/23	V. Polnick	0.7	570.50	Respond to UST re designation hearing.
10/17/23	M. Ghyas	0.5	257.50	Reviewed case materials from C. Cameron (.2); review correspondence between parties regarding outstanding items (.3).
10/18/23	V. Emery	0.4	234.00	Conduct review and analysis of Candy Club intellectual property assets.
10/18/23	M. Ghyas	0.3	154.50	Correspondence with team regarding case materials (.2); review case documents for outstanding items (.1).
10/18/23	M. Ghyas	0.7	360.50	Conference with Z. McKay and correspondence with V. Polnick re outstanding items.
10/18/23	M. Ghyas	0.3	154.50	Correspondence with T. Emery re USPTO search for registered marks.
10/19/23	M. Ghyas	1.0	515.00	Correspondence with client; with lender regarding outstanding items
10/23/23	V. Polnick	0.7	570.50	Coordinate mediation and other cases administrative tasks.
10/24/23	E. Flynn Meraia	0.4	254.00	Telephone conference with JW team re works in progress.
10/24/23	M. Ghyas	0.4	206.00	Conference with V. Polnick, Z. McKay, E. Meraia re schedule and case management strategy (.4)

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
10/25/23	Z. McKay	2.4	1,740.00	Prepare for and lead call with UST attorney (.9) Strategy communications with debtor team. (1.0) Communications re mediation with WTI and others. (.5)
10/26/23	Z. McKay	0.8	580.00	Review deposition notice. (.3) Communications re mediation. (.3) Communication re bar date notice. (.2)
Total Case Administration		127.6	\$ 80,505.00	
<b><u>Reporting:</u></b>				
08/07/23	Z. McKay	1.5	1,050.00	Prepare for and attend meeting with debtor re SOFA, Schedules.
08/07/23	E. Flynn Meraia	1.1	621.50	Telephone conference with Stretto, Company re schedules and statements.
08/11/23	C. Cameron	2.0	1,070.00	Call with team to discuss ongoing work streams (0.7); prepare Initial Debtor Interview Report and questions for answering by the company (0.8); correspond with company regarding notice parties (0.5).
08/12/23	Z. McKay	5.7	3,990.00	Work on response to UST inquiry.
08/14/23	V. Polnick	2.0	1,500.00	Call w/ T. Howley (.5), prepare for IDI (1.0), revise response to UST (.5)
08/14/23	Z. McKay	4.5	3,150.00	Work on UST inquiry.
08/14/23	C. Cameron	3.1	1,658.50	Call with company to prepare for IDI (1.0); review (1.6); provide comment to IDI report and correspond with company regarding revisions to same (.5).
08/14/23	E. Flynn Meraia	0.7	395.50	Telephone conference with Company re IDI (.5); correspond with C. Cameron re same (.2)
08/15/23	V. Polnick	2.0	1,500.00	Attended IDI (.5), internal discussion re IDS (1.5)
08/15/23	Z. McKay	2.0	1,400.00	Review IDI, prepare for meeting.
08/15/23	C. Cameron	0.6	321.00	Attend IDI with company.
08/15/23	E. Flynn Meraia	1.0	565.00	Attend IDI (.5); correspond re same (.5)

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
08/17/23	C. Cameron	2.2	1,177.00	Prepare summary of reporting requirements (1.9); Review questions regarding SOFAs and schedules and provide answers to same (0.3).
08/17/23	E. Flynn Meraia	0.6	339.00	Correspond re schedules & statements.
08/18/23	V. Polnick	1.0	750.00	Participate in call re Schedule and statements.
08/18/23	Z. McKay	0.5	350.00	Participate in conference call with Stretto re schedules and statements.
08/18/23	C. Cameron	0.9	481.50	Call with team regarding schedules and SOFAs.
08/18/23	E. Flynn Meraia	0.9	508.50	Conference and correspond re schedules & statements.
08/19/23	C. Cameron	0.3	160.50	Review Monthly Operating Report and provide comments to client.
08/21/23	C. Cameron	2.5	1,337.50	Review and revise Monthly Operating Reports (1.3); confer with team regarding same (1.2).
08/23/23	C. Cameron	0.2	107.00	Confer with company and UST regarding bank statements.
08/28/23	V. Polnick	4.0	3,000.00	Review and revise schedules and statements with Stretto team.
08/28/23	C. Cameron	0.8	428.00	Review SOFAs and schedules for filing.
08/28/23	J. Pupo	0.7	161.00	Prepare for filing of SOFA and Schedules
08/31/23	C. Cameron	0.8	428.00	Review questions provided by UST to schedules and SOFAs and prepare draft responses to same.
09/01/23	C. Cameron	0.8	428.00	Review and address questions presented by UST related to schedules.
09/05/23	D. Trevino	0.3	72.00	Circulate as filed copies of schedules/SOFA.
09/07/23	C. Cameron	0.3	160.50	Review Monthly Operating Reports.
09/19/23	C. Cameron	0.8	428.00	Prepare requested edits for revised schedules.
09/20/23	C. Cameron	0.1	53.50	Correspond with team regarding amended schedule matters.
09/28/23	C. Cameron	0.5	267.50	Revise insurance report for distribution to UST.
09/28/23	C. Cameron	0.8	428.00	Prepare amended schedules for review and completion by client.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
10/02/23	C. Cameron	0.6	351.00	Provide comment to amended Schedules.
10/05/23	C. Cameron	0.4	234.00	Final review of amended schedules (0.2); review Monthly Operating Reports for filing (0.2).
10/06/23	C. Cameron	0.1	58.50	Distribute bank statements to US Trustee.
10/09/23	C. Cameron	0.9	526.50	Review final amended schedules for filing (0.1); confer with Stretto regarding same (0.1); revise amended schedules (0.6); distribute tax returns to IRS representative (0.1).
10/09/23	D. Trevino	0.7	175.00	Edits to the schedules, compiled and circulate to C. Cameron (.2) Compile and prepare amended schedules for filing (.4) Coordinate service (.1)
10/17/23	C. Cameron	0.2	117.00	Review Taxes reporting and share same with the US Trustee.
10/24/23	M. Ghyas	0.9	463.50	Review internal memo re upcoming monthly deadlines and reporting requirements.
Total Reporting		49.0	\$ 30,212.50	

**Meetings of and Communications with Creditors:**

08/02/23	E. Flynn Meraia	0.7	395.50	Telephone conference with creditor re case inquiries.
08/03/23	Z. McKay	2.5	1,750.00	Communications with creditors. (1.0) Communications with client re current issues. (1.5)
08/03/23	E. Flynn Meraia	0.5	282.50	Telephone conference with creditor re case inquiries (.2); correspond re same (.3)
08/18/23	D. Trevino	0.2	48.00	Communicate with team regarding the NetSuite Oracle call.
08/23/23	C. Cameron	0.4	214.00	Confer with client regarding notifications of past due invoices (0.2); coordinate 341 meeting scheduling (0.2).
08/28/23	Z. McKay	0.3	210.00	Prepare for and attend 341 meeting.
08/28/23	C. Cameron	0.2	107.00	Prepare notice of reset of 341 meeting.
09/04/23	C. Cameron	0.2	107.00	Further prepare responses to UST questions in preparation of 341 meeting.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/05/23	V. Polnick	2.0	1,500.00	Prepare for (.5) and attend 341 meeting of creditors (1.5).
09/05/23	C. Cameron	1.5	802.50	Attend 341 meeting (1.4); confer with team regarding same (0.1).
09/07/23	C. Cameron	0.2	107.00	Call with creditor regarding case status and filed claim.
09/13/23	C. Cameron	0.2	107.00	Call with City National Bank counsel.
Total Meetings of and Communications with Creditors		8.9	\$ 5,630.50	

**Fee/Employment Applications:**

08/08/23	D. Trevino	2.5	600.00	Draft JW retention application.
08/09/23	D. Trevino	2.3	552.00	Continued draft for the JW retention application.
08/28/23	V. Polnick	1.0	750.00	Revise JW retention application.
08/28/23	C. Cameron	2.5	1,337.50	Review and revise retention application.
08/29/23	C. Cameron	0.6	321.00	Review and revise retention application.
09/20/23	V. Polnick	1.4	1,050.00	Communicate with UST re: Motion to Seal (.3); Preview and revise retention application (1.1)
09/20/23	C. Cameron	1.5	802.50	Draft Supplemental Declaration and review list of supplemented parties (0.8); prepare motion to seal (0.7).
09/20/23	D. Trevino	2.3	552.00	Draft supplemental declaration of V. Polnick regarding the JW retention application (.9); Create schedules to be filed under seal, circulate internally (.9) First draft of Motion to File Under Seal (.5)
09/21/23	V. Polnick	0.2	150.00	Draft motion to seal.
09/21/23	C. Cameron	0.8	428.00	Review final drafts of supplemental declaration, motion to seal, and conflicts party list.
Total Fee/Employment Applications		15.1	\$ 6,543.00	

**(Client Defined):**

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
08/08/23	L. Peschel	0.8	620.00	Analyze pleadings; discuss case status with Keith Cohn.
08/09/23	L. Peschel	0.5	387.50	Correspond with Keith Cohn regarding recommendation for trade dress case; correspond with current Candy Club counsel in trade dress case.
08/10/23	L. Peschel	1.1	852.50	Discuss case status with Strook; correspond with client regarding case strategy.
08/11/23	L. Peschel	2.6	2,015.00	Draft interrogatory responses; correspond with local counsel regarding service; call and correspond with opposing counsel regarding extension.
08/17/23	L. Peschel	1.1	852.50	Draft pro hac vice application form and proposed order in accordance with the requirements of the Central District of California in order to appear as counsel.
Total (Client Defined)		6.1	\$ 4,727.50	
<b><u>Non-Working Travel:</u></b>				
07/28/23	C. Cameron	2.0	1,070.00	Travel home from filing and first day hearing. (Billed at half)
Total Non-Working Travel		2.0	\$ 1,070.00	
<b><u>Business Operations:</u></b>				
07/31/23	C. Cameron	2.3	1,230.50	Prepare email correspondence re critical vendors motion (0.8); correspond with executives regarding same (0.4); correspond with company regarding vendor issues (0.3); call with team to discuss ongoing workstreams (0.5); call with V. Polnick to discuss vendor's motion (0.3).
08/01/23	C. Cameron	4.4	2,354.00	Correspond with team and company regarding vendor issues (3.2); perform further diligence on company and related company contracts (1.2).
08/02/23	C. Cameron	4.6	2,461.00	Perform contract diligence to determine active contracts (0.9); revise Vendor's Motion and related exhibits and confer with team and company regarding same (3.7).



<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
08/03/23	C. Cameron	4.2	2,247.00	Review license agreement (0.2); prepare for and attend call with vendor (0.6); revise vendors motion (0.2); call with N. Giradano to discuss vendor topics (0.3); correspond with team regarding vendors issues and review agreements related to same (0.5); prepare notice of commencement (0.3); conduct further diligence on material contracts, vendor claims, and executory contracts (2.1).
08/04/23	Z. McKay	3.6	2,520.00	Communications with client re wire timeline for adequate protection and vendor payments (.7); Communications with client re vendor issues (1.0); Work on critical vendor issues (.8); Attention to notice of commencement (1.1).
08/04/23	C. Cameron	3.1	1,658.50	Revise vendors motion (1.4); correspond with team regarding same (.4); call with K. Cohn to discuss vendors communications (0.3); call with R. Saraceni to discuss schedules (0.1); call with Strook attorney to discuss trademark case and confer with team regarding same (0.4); revise Notice of Commencement and prepare for filing (0.5).
08/07/23	Z. McKay	2.5	1,750.00	Work on critical vendor motion.
08/07/23	C. Cameron	2.9	1,551.50	Revise critical vendors motion in accordance with comments from team (1.8); draft declaration related to same (1.1).
08/08/23	Z. McKay	4.5	3,150.00	Work on critical vendor motion.
08/08/23	C. Cameron	2.9	1,551.50	Call with Z. McKay to discuss vendor's motion (0.5); further revise vendor's motion (1.5); perform further diligence related to vendors and outstanding contracts (0.9).
08/08/23	E. Flynn Meraia	0.7	395.50	Telephone conference with Z. McKay re vendors motion.
08/08/23	D. Trevino	0.6	144.00	Compile and prepare for filing the emergency vendors motion and supporting declaration (.3) Coordinate service (.1) Draft witness and exhibit list for hearing (.2)
08/09/23	Z. McKay	0.8	560.00	Attend critical vendor hearing.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
08/09/23	C. Cameron	0.3	160.50	Attend hearing on vendor's motion.
08/09/23	E. Flynn Meraia	1.6	904.00	Attend hearing re vendors motion (.3); prepare re same (1.2); telephone conference with C. Cameron re same (.1).
08/09/23	D. Trevino	0.6	144.00	Compile and prepare for filing the witness and exhibit list for Critical Vendors hearing (.3) Compiling and prepare for filing the revised Critical Vendors Order (.1) Attend hearing on critical vendors motion (.2)
08/10/23	Z. McKay	2.2	1,540.00	Communication re critical vendors.
08/10/23	C. Cameron	1.4	749.00	Confer with team and company regarding vendor issues (0.4); Prepare summary of reporting obligations (1.0).
08/11/23	C. Bristow	0.5	372.50	Correspond re vendor motion and interview questions with US Trustee.
08/11/23	Z. McKay	1.0	700.00	Work on critical vendor issues.
08/14/23	C. Cameron	1.3	695.50	Call with vendor re case status (0.4); correspond with vendors and review contracts related to same (0.9).
08/14/23	C. Cameron	0.2	107.00	Correspond with insurance regarding notice of changes to coverage.
08/15/23	C. Cameron	0.1	53.50	Correspond with company and vendors regarding ongoing vendor issues.
08/18/23	C. Cameron	0.3	160.50	Call with vendor to discuss ongoing relationship.
09/13/23	Z. McKay	0.9	630.00	Work on cash management issue.
09/13/23	C. Cameron	0.2	107.00	Correspond with company regarding vendor payments made (0.1);. draft correspondence to UST and Sub V Trustee regarding same (0.1).
09/19/23	Z. McKay	1.2	840.00	Work on cash management issues.
09/22/23	M. Hughes	0.4	160.00	Coordinate certified entity documents from four entities from respective secretaries of state.
09/25/23	Z. McKay	1.0	700.00	Attention to credit card issue with regard to cash management order.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/25/23	E. Flynn Meraia	1.5	847.50	Telephone conference with Company re hearing (.5); telephone conference with team re same; (.3); revise cash management order (.5); attend hearing re same (.2).
09/26/23	M. Hughes	0.4	160.00	Follow up on certified entity documents (.1); receipt, analysis and indexing of entity documents for four entities (.3).
09/28/23	E. Flynn Meraia	0.3	169.50	Correspond re insurance reporting.
09/29/23	C. Cameron	0.2	107.00	Revise Insurance Report and share with UST.
10/30/23	Z. McKay	0.5	362.50	Work on insurance update and deposition location information per UST request.
Total Business Operations		53.2	\$ 31,243.50	
<b><u>Financing/Cash Collections:</u></b>				
07/27/23	C. Bristow	2.5	1,862.50	Review due diligence regarding the DIP financing, checklist and corporate formalities (.8), communications and loan document updates (1.0), attend conference calls (.7).
07/27/23	Z. McKay	14.9	10,430.00	Work on DIP issues.
07/28/23	C. Bristow	0.5	372.50	Correspond re DIP and officer's certificate.
07/28/23	Z. McKay	12.5	8,750.00	Prepare for and argue priming DIP hearing. (3.5) Negotiation regarding same. (3) Prepare for and argue after break priming DIP hearing. (3.5) Make edits to documents, communications regarding same. (2.5)
07/28/23	C. Cameron	4.3	2,300.50	Meet with team regarding DIP financing (.3); continue diligence related to same (4.0).
07/30/23	Z. McKay	0.8	560.00	Work on interim DIP issues.
07/31/23	C. Bristow	0.4	298.00	Review communications regarding DIP order and borrowing base discussions, along with the inventory discussions and additional Note information.
07/31/23	Z. McKay	2.8	1,960.00	Revise DIP order (1.0); Communications re witness prep (.8); Prepare for DIP hearing (1.0).

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
07/31/23	C. Cameron	2.9	1,551.50	Review multiple iterations of DIP budget and related pleadings (2.5); discuss same with team (.4).
07/31/23	D. Trevino	0.4	96.00	Create comparison document for DIP order, compile and prepare for filing (.2); communicate with chambers regarding same (.2).
08/01/23	C. Bristow	2.2	1,639.00	Attend conference call on WIP (.6); attend conference call re witness prep (.4) review extensive communications surrounding DIP budget and responses (1.2).
08/01/23	V. Polnick	9.0	6,750.00	Prepare for DIP hearing including negotiation with parties in interest and witness preparation.
08/01/23	V. Polnick	10.0	7,500.00	Follow up IDI setting (.2); follow up re IDS subordination (2.0); WTI settlement discussions regarding subordination (3.8), adequate protection (.5), and terms of DIP Order (1.2), Gemcap term sheet discussions (1.4), Barry direct exam prep for continued DIP hearing (.9).
08/01/23	Z. McKay	14.3	10,010.00	Prepare for second interim DIP hearing.
08/01/23	D. Trevino	0.4	96.00	Compile and prepare for filing the revised Interim DIP order (.3); communicate with chambers re same (.1).
08/02/23	C. Bristow	1.2	894.00	Review extensive communications, including providing further detail on the fee schedule information for the DIP loan documents and certain language contained in the Loan Agreement.
08/02/23	V. Polnick	9.0	6,750.00	Coordinate and prepare for DIP hearing (5.0), negotiated with creditors regarding same (3.5), lead DIP hearing (.5).
08/02/23	Z. McKay	10.7	7,490.00	Settlement efforts for DIP hearing (2.7); Prep for DIP hearing (6.5); Attend DIP hearing (.5) Communications with client following DIP (1.0).
08/02/23	E. Flynn Meraia	0.5	282.50	Attend DIP hearing.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
08/02/23	D. Trevino	1.0	240.00	Compile further revised Interim DIP Order, prepare for filing (.2); attend continued Interim DIP hearing (.5); assist with preparation for same (.3).
08/03/23	C. Bristow	1.8	1,341.00	Review extensive communications and schedule documentation, along with prepayment language and the additional funding
08/04/23	C. Bristow	1.0	745.00	Review extensive motion information, communications on filings, and documents for DIP loan and filings.
08/09/23	Z. McKay	0.5	350.00	Communication with prepetition lender re DIP hearing.
08/14/23	Z. McKay	0.8	560.00	Work on final DIP issues.
08/16/23	V. Polnick	2.0	1,500.00	Internal team meeting re DIP negotiation strategy and case strategy.
08/17/23	Z. McKay	2.2	1,540.00	Work on Final DIP issues.
08/18/23	Z. McKay	1.0	700.00	Coordinate moving final DIP hearing, communications re same.
08/25/23	Z. McKay	4.2	2,940.00	Multiple communications with DIP lender re intercreditor agreement (1.0); work on IDS issues. (3.2).
09/05/23	Z. McKay	1.4	980.00	Work on exit financing issues.
09/11/23	Z. McKay	3.0	2,100.00	Prepare for DIP hearing.
09/12/23	V. Polnick	0.2	150.00	Correspond with K. Cohn re DIP tranche access.
09/12/23	Z. McKay	2.3	1,610.00	Communication with creditors re IDS and DIP hearing getting moved (.4); Communication with IDS re IDS stipulation (.1); Prepare for and participate in call with prepetition lender (1.8).
09/12/23	C. Cameron	0.5	267.50	Review Notice of Reset for DIP and Cash Management hearing.
09/13/23	Z. McKay	1.1	770.00	Work on Final DIP issues.
09/18/23	E. Flynn Meraia	1.3	734.50	Review, revise final DIP order.
09/19/23	E. Flynn Meraia	0.2	113.00	Correspond re final DIP order.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/20/23	Z. McKay	2.5	1,750.00	Communications with UST re subchapter v designation. (.1) Communications with Sub V trustee re DIP. (.2) Work on Final DIP order. (1.2). Participate in strategy/WIP call. (.5) Circulate final DIP order to all relevant parties. (.5)
09/21/23	Z. McKay	1.7	1,190.00	Review comments from UST on final DIP order (.4). Work on review of financial docs for Final DIP next week (1.3).
09/22/23	V. Polnick	2.5	1,875.00	Review and revise final DIP order.
09/22/23	Z. McKay	3.6	2,520.00	Work with various parties on Final DIP Order (3.3); Client update call (.3).
09/22/23	C. Cameron	1.7	909.50	Review and revise DIP financing order (1.5); confer and correspond with the team regarding same (.2).
09/22/23	W. Farmer	2.3	1,230.50	Review DIP loan agreement and provide comment to JW team.
09/24/23	Z. McKay	1.5	1,050.00	Work on final changes with Final DIP Order.
09/24/23	C. Cameron	0.7	374.50	Revise Final DIP Order.
09/25/23	C. Bristow	1.2	894.00	Calls to discuss status updates with the hearing and questions regarding the language in the DIP loan documents, follow-up email communications concerning same, review officer's certificates and disclosure schedule
09/25/23	V. Polnick	5.0	3,750.00	Prepare for (4.7) and attend (.3) hearing on cash management and final DIP.
09/25/23	V. Polnick	2.3	1,725.00	Review revised DIP order and various comments to same (1.6); coordinate entry of same (.7).
09/25/23	V. Polnick	0.8	600.00	Discuss personal guarantee of credit card w/ counsel to CNB and client, amended DIP order accordingly.
09/25/23	Z. McKay	3.2	2,240.00	Prepare for and participate in update call with client (1.0); Multiple communications with various parties re final DIP order language (2.2); Prepare for (1.4) and attend (.3) hearing on DIP, status conference for sub V, and final cash management.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/25/23	C. Cameron	3.5	1,872.50	Call with company to discuss hearing (0.5); prepare for hearing (1.0), amend motions (1.0), coordinate filing re same (.2); attend hearing on cash management, DIP financing, sub V status conference (0.3); prepare schedules and officer's certificate related to DIP financing (0.5).
09/25/23	D. Trevino	0.7	168.00	Compile and prepare for filing the final cash management order and redline (.2) Compile and prepare for filing the Interim DIP Order (.2) Attend hearing on final DIP and final Cash Management (.3)
09/26/23	Z. McKay	0.6	420.00	Communication with client re exit financing and IDS settlement.
09/27/23	C. Cameron	1.0	535.00	Review and revise form NDA.
09/28/23	V. Polnick	0.7	525.00	Respond to internal DIP financing docs.
10/03/23	C. Cameron	1.1	643.50	Correspond with DIP lender regarding schedules and certificates (0.6); call with company to discuss exit financing and same (0.5).
10/05/23	C. Cameron	0.6	351.00	Revise DIP financing schedules (.4) correspond with team regarding same (.2).
10/06/23	C. Cameron	0.1	58.50	Correspond with K. Cohn and team regarding non-disclosure agreement.
10/06/23	C. Cameron	0.4	234.00	Correspond with DIP financing counsel regarding schedules and officer's certificates.
10/10/23	V. Polnick	1.0	815.00	Respond to WTI re offer (.7) discuss placement of DACA on operating account with Gemcap(.3).
10/11/23	C. Cameron	0.6	351.00	Revise Officer's Certificates in accordance with agreed upon language (0.3); correspond with company regarding DACA for DIP financing and confer with team regarding same (0.3).
10/13/23	Z. McKay	0.5	362.50	Work on DIP loan doc issues.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
10/16/23	C. Bristow	1.6	1,360.00	Review communications concerning certain concepts and calculations in the loan documents (.3); update loan documents accordingly (.9), provide feedback on revised documents and further explanation as to certain concepts within the documentation (.4).
10/16/23	C. Cameron	0.4	234.00	Correspond with C. Bristow and company regarding DIP financing documents (0.2); prepare Officer's Certificates for completion (0.2).
10/17/23	C. Bristow	1.3	1,105.00	Communications regarding the cap on eligible inventory and providing the backup language in the documentation (.6), call with client discussing this issue (.5), follow-up communications and provide prepayment terms to debtor explaining calculations (.2).
10/17/23	V. Polnick	0.5	407.50	Call with client re: borrowing base and other issues.
10/17/23	C. Cameron	1.4	819.00	Call with M. Berens to discuss DIP financing documents (0.2); call with Company to discuss same (0.6); prepare email correspondence regarding remaining open items for DIP financing documents (0.6).
10/18/23	C. Bristow	0.5	425.00	Communications concerning the updates to the loan documents and subordination of \$1M inventory
10/18/23	M. Ghyas	0.5	257.50	Correspondence with GemCap re DIP call (.1); correspondence with S. Solomon re DIP call (.1); review documents in preparation for meeting (.3).
10/19/23	C. Bristow	1.0	850.00	Call with parties discussing the signing of the DIP documents and subordination (.5), review update final documents and provide feedback as to the changes within the loan documents (.5).
10/19/23	V. Polnick	0.5	407.50	Participate in DIP/closing call with GemCap.



<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
10/19/23	M. Ghyas	3.3	1,699.50	Correspondence with team and conference with V. Polnick re outstanding items needed to finalize DIP transaction (.5); meeting with M. Berens, M. Taylor, V. Polnick and C. Bristow re finalizing process (.5). Reviewed documents sent by M. Berens (.5); communicate with client re outstanding items re DIP agreement (.2); consolidate necessary documents for client review (.8); correspondence with C. Britsow re finalizing transaction with lender and outstanding documents (.3).
10/19/23	M. Ghyas	1.0	515.00	Reviewed correspondence and communicated with client regarding outstanding items still needed to finalize DIP agreement (.2); consolidated necessary documents for client review (.8)
10/20/23	C. Bristow	1.0	850.00	Communications regarding the final DIP documents and signatures.
10/23/23	C. Bristow	0.4	340.00	Review communications regarding final entity documents and DIP loan documents.
10/23/23	Z. McKay	2.5	1,812.50	Attention to subordination agreement issues (2.0); communications with WTI re mediation (.5).
10/24/23	C. Bristow	0.5	425.00	Review communications with final signed DIP loan documents.
10/25/23	C. Bristow	0.5	425.00	Review communications regarding the assignment of loan and extension motion (.2); review assignment of the loan documentation (.3).
10/25/23	M. Ghyas	0.1	51.50	Review correspondence received from third party lender.
Total Financing/Cash Collections		180.6	\$ 124,662.00	

**Claims Administration and Objections:**

08/15/23	Z. McKay	1.2	840.00	Work on IDS claim issues.
08/17/23	V. Polnick	2.0	1,500.00	Coordinate w/ various parties re case timeline and claim settlement.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
08/18/23	V. Polnick	3.0	2,250.00	Draft proposal for IDS settlement and obtained client approval
08/18/23	Z. McKay	1.5	1,050.00	Analyze IDS claim issues.
08/22/23	V. Polnick	2.0	1,500.00	Monitor existing workstreams including IDS settlement and UST follow up.
08/24/23	Z. McKay	2.1	1,470.00	Work on claim settlement.
08/26/23	Z. McKay	2.6	1,820.00	Work on IDS claim issues.
08/27/23	Z. McKay	0.9	630.00	Work on IDS claim issues.
08/28/23	V. Polnick	1.0	750.00	Discuss and manage IDS settlement.
08/28/23	Z. McKay	0.7	490.00	Multiple communications with IDS, DIP Lender re lien issues.
08/29/23	V. Polnick	1.0	750.00	Negotiate IDS settlement terms with IDS counsel.
08/29/23	Z. McKay	3.4	2,380.00	Work on IDS issue.
08/30/23	Z. McKay	4.9	3,430.00	Work on IDS issue.
08/30/23	D. Trevino	0.4	96.00	First draft of stipulation of the Debtors and Integrated Distribution Services.
08/31/23	Z. McKay	0.8	560.00	Work on IDS issues.
09/01/23	V. Polnick	0.5	375.00	Discuss and negotiate IDS stipulation.
09/01/23	Z. McKay	2.2	1,540.00	Work on IDS issues.
09/05/23	Z. McKay	1.8	1,260.00	Work on IDS issues.
09/06/23	V. Polnick	1.5	1,125.00	Negotiate with IDS counsel regarding terms of stipulation.
09/07/23	V. Polnick	3.7	2,775.00	Negotiate terms of stipulation and agreed order re subordination.
09/07/23	Z. McKay	3.4	2,380.00	Finalize settlement documents with IDS.
09/07/23	Z. McKay	2.8	1,960.00	Prepare for hearing tomorrow re IDS settlement.
09/07/23	E. Flynn Meraia	0.7	395.50	Revise IDS stipulation (.3); correspond re same (.4).

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
09/07/23	D. Trevino	0.9	216.00	Review and prepare for filing the Stipulation of the Debtors and Integrated Distribution Services (.2) Draft notice of hearing regarding same (.5) Compile and revised for filing (.1) Coordinate service (.1)
09/08/23	V. Polnick	7.0	5,250.00	Prepare for(6.3) and attend (.7) hearing on entry of subordination stipulation.
09/08/23	Z. McKay	9.1	6,370.00	Prepare for (8.4) and participate (.7) in IDS stipulation hearing.
09/08/23	E. Flynn Meraia	0.7	395.50	Attend hearing re IDS stipulation.
09/08/23	D. Trevino	0.2	48.00	Correspond with client re hearing participation and instructions for same.
09/08/23	D. Trevino	0.5	120.00	Create comparison document for stipulation of the Debtors and Integrated Distribution Services (.3) Compile and prepare for filing (.2)
09/08/23	D. Trevino	0.5	120.00	Attend hearing on stipulation of the Debtors and Integrated Distribution Services regarding the DIP.
09/10/23	Z. McKay	1.5	1,050.00	Work on IDS stipulation issues.
09/10/23	C. Cameron	0.4	214.00	Revise Stipulation and Agreed Order.
09/11/23	V. Polnick	4.4	3,300.00	Negotiate revised stipulation and worked towards entry of same.
09/11/23	Z. McKay	4.7	3,290.00	Work on IDS stipulation issues.
09/11/23	C. Cameron	1.8	963.00	Revise IDS stipulation and agreed order.
09/11/23	D. Trevino	0.3	72.00	Communicate with team regarding revised stipulation of the Debtors and IDS, compile and prepare for filing.
09/18/23	Z. McKay	1.0	700.00	Follow up work on IDS stipulation.
09/20/23	V. Polnick	0.3	225.00	Correspond with Subchapter V Trustee re IDS Stipulation.
09/26/23	V. Polnick	0.1	75.00	Communicate w/ counsel for WTI re WTI claim.
10/03/23	V. Polnick	0.5	407.50	Call with WTI to discuss case status (.5); relay WTI offer to client (.2).

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
10/03/23	Z. McKay	0.5	362.50	Prepare for and attend conference call with WTI counsel.
10/09/23	Z. McKay	0.5	362.50	Work on review of WTI claim.
10/18/23	M. Ghyas	0.8	412.00	Correspondence with team regarding final WTI agreements and pending outstanding items (.2); reviewed past agreements and communications re same (.6).
10/19/23	Z. McKay	2.2	1,595.00	Review loan documents (1.0); analyze IDS subordination issue (1.2).
10/19/23	M. Ghyas	2.4	1,236.00	Review and edit IDF Agreement (.5); conference with V. Polnick re same (.2); correspondence with S. Solomon re warehouseman agreement (.3); correspondence with K. Cohn re outstanding items re IDF agreement (.4); incorporate comments for S. Solomon re outstanding IDF agreement (.3); correspondence with Z McKay re IDS agreement (.5); correspondence with V Polnick re same (.2).
10/20/23	Z. McKay	0.3	217.50	Analyze subordination issue.
10/20/23	M. Ghyas	0.5	257.50	Correspondence with V. Polnick re outstanding items relating to IDS agreement (.2); correspondence with M. Berens re same (.1); correspondence with K. Cohn re same (.2).
10/23/23	M. Ghyas	0.8	412.00	Correspondence with K. Cohn re IDS agreement and finalizing same (.5); correspondence with M. Berens, V. Polnick re finalizing IDS agreement (.3).
10/23/23	M. Ghyas	0.7	360.50	Call with M. Berens re outstanding documents and deadlines relating to execution of IDS agreement (.2); review assembled documents for release (.3); conference with team re same (.2)
10/27/23	E. Flynn Meraia	1.4	889.00	Revise notice of bar dates.
10/27/23	M. Ghyas	0.4	206.00	Research re bar date (.2); review notice of commencement re bar date (.1); draft bar date notice filing (.1).
10/27/23	M. Ghyas	0.5	257.50	Draft bar date notice.
10/29/23	Z. McKay	0.2	145.00	Work on notice of claim bar date issue.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
10/29/23	E. Flynn Meraia	0.3	190.50	Revise notice of bar dates (.1); correspond re same (.2).
10/29/23	D. Trevino	0.3	75.00	Review and prepare for filing the corrected notice regarding POC deadlines, coordinate service.
Total Claims Administration and Objections		89.8	\$ 61,121.00	

**Plan and Disclosure Statement (including Business Plan):**

08/17/23	Z. McKay	1.0	700.00	Work on plan development.
08/22/23	Z. McKay	3.3	2,310.00	Work on plan matters.
08/23/23	Z. McKay	0.4	280.00	Work on plan issues.
09/05/23	D. Trevino	2.5	600.00	Draft shell for the combined plan and DS.
09/06/23	D. Trevino	3.0	720.00	First draft of scheduling DS motion and exhibits.
09/08/23	C. Cameron	0.8	428.00	Draft combined plan and disclosure statement.
09/13/23	C. Cameron	2.3	1,230.50	Draft Plan and Disclosure Statement.
09/14/23	C. Cameron	2.5	1,337.50	Continue draft of plan and disclosure statement.
09/15/23	Z. McKay	0.4	280.00	Communications re plan issues.
09/26/23	E. Flynn Meraia	3.0	1,695.00	Review, revise combined DS and plan (2.8); conference with V. Polnick re same (.2)
10/03/23	Z. McKay	0.7	507.50	Work on plan and DS.
10/03/23	C. Cameron	0.2	117.00	Review subchapter V plan requirements.
10/04/23	C. Cameron	1.7	994.50	Revise draft of Plan.
10/05/23	Z. McKay	1.6	1,160.00	Communications re WTI plan treatment.
10/06/23	Z. McKay	0.8	580.00	Work on WTI communications, possible mediation efforts (.3); work on plan/DS (.5).
10/06/23	E. Flynn Meraia	5.2	3,302.00	Draft plan of reorganization (4.2); research re same (1.0).
10/12/23	Z. McKay	1.5	1,087.50	Work on plan issues.
10/12/23	E. Flynn Meraia	2.8	1,778.00	Draft, revise combined plan of reorganization and disclosure statement.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
10/24/23	Z. McKay	4.7	3,407.50	Work on chapter 11 plan (1.0); Communication with WTI (.7); Communication with UST (1.0); Communication with client contact (.8); Internal WIP meeting re plan status (.5); Work on motion to extend plan filing period (.7).
10/24/23	D. Trevino	0.6	150.00	First draft for motion to extend exclusivity.
10/25/23	Z. McKay	2.7	1,957.50	Draft motion to extend time to file plan.
10/25/23	E. Flynn Meraia	0.8	508.00	Review, revise motion to extend plan filing (.4); review, revise mediation agreed order (.4).
10/25/23	M. Ghyas	0.4	206.00	Draft stipulation and order re WTI mediation.
10/25/23	M. Ghyas	0.2	103.00	Review motion to extend exclusivity.
10/26/23	M. Ghyas	0.4	206.00	Review agreed motion and order re WTI mediation (.3); correspond with team re same (.1); correspondence with team regarding scheduling mediation with WTI (.1).
Total Plan and Disclosure Statement (including Business Plan)		43.5	\$ 25,645.50	